

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

In Re:)
)
JOHN MALONE)
)
)
Debtor)
)
)

Chapter 13
Case No. 24-10885-CJP

DEBTORS' MOTION FOR LEAVE TO FILE RESPONSE LATE

Now comes, John Malone, ("Debtor") by and through undersigned counsel, Glenn F. Russell, Jr., and who herein respectfully FILES THIS Morion incompliance with this Court's Order of July 15, 2024, to File Late the Debtor's Response to the Trustee's Motion to Dismiss case.

The Debtor, through undersigned counsel, herein attaches his proposed response at Exhibit A attached hereto.

WHEREFORE, for all of the foregoing reasons, the Debtor, by and through his counsel, Glenn F. Russell, Jr., respectfully requests that the Court Grant the Debtor's Motion to file his Response to the Trustee's Motion to Dismiss Case Late

Respectfully submitted,

Date: July 30, 2024

Attorney for the Debtor
/s/ Glenn F. Russell, Jr.
Glenn F. Russell, Jr.
BBO# 656914
38 Rock Street, Suite #12
Fall River, MA 02720
(888) 400-9318
russ45eq@gmail.com

CERTIFICATE OF SERVICE

I, Glenn F. Russell, Jr., do hereby certify that on the 30th day of July 2024, I served the Debtors' Motion to File the Debtors Motion for Leave to File Response Late to the Chapter 13 Trustee's Motion to Dismiss case (Doc. #31), along with the Proposed Response attached thereto to Comply with this Court's Order to Update, to the following parties via electronic mail and submission to the ECF System, and/or by USPS postage prepaid to the following::

Assistant U.S. Trustee

John Fitzgerald

Office of the US Trustee
J.W. McCormack Post Office &
Courthouse
5 Post Office Sq., 10th Fl, Suite 1000
Boston, MA 02109

Trustee

Carolyn Bankowski
Ch 13-12 Trustee Boston
P. O. Box 8250
Boston, MA 02114
617-723-1313

Jason J. Giguere, Esq.
Orlans PC Attorneys for Federal Home Loan
Mortgage Corporation, as Trustee for the benefit of
the Freddie Mac Seasoned Credit Risk Transfer Trust,
Series 2020-1
PO Box 540540
Waltham, MA 02454

Marcus E. Pratt, Esquire
Korde & Associates, P.C. 900 Chelmsford Street,
Suite 3102 Lowell, MA 01851 Attorneys for
The Bank of New York Mellon FKA The Bank of New
York, as successor Trustee to JPMorgan Chase Bank,
N.A., as Trustee on behalf of the Certificateholders of
the CWHEQ Inc., CWHEQ Revolving Home Equity
Loan Trust, Series 2005-F

Boston Water and Sewer Commission

P.O. Box 55466
Boston, MA 02205

City of Boston Real Estate Tax
CITY OF BOSTON, BOX 55808
Boston, MA 02205

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Discover Bank
2479 Edison Blvd, Unity A
Twinsburg, OH 44087-234

Discover Bank
2479 Edison Blvd, Unity A
Twinsburg, OH 44087-234

Fed Home Loan Mortgage Corp as Trustee
26 Savin Hill Ave
Dorchester, MA 02125

National Grid
P.O. Box 371338
Pittsburgh, PA 15250-7338

National Grid
P.O. Box 371338
Pittsburgh, PA 15250-7338

Specialized Loan Servicing, LLC
Specialized Loan Servicing LLC
P.O. Box 636005
Littleton, CO 80163-6005

The Bank of NY Mellon Indenture Trustee
c/o Bank of America, N.A.
475 Cross Point Pkwy PO Box 9000
Getzville, NY 14068-9000

/s/ Glenn F. Russell, Jr.
Glenn F. Russell, Jr.

EXHIBIT

A

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FOR THE DISTRICT OF MASSACHUSETTS
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In Re:)
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JOHN MALONE)
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Debtor)
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Chapter 13
Case No. 24-10885-CJP

**DEBTORS' RESPONSE TO THE TRUSTEE MOTION TO DISMISS
(Doc. #31)**

Now comes, John Malone, ("Debtor") by and through undersigned, who herein respectfully responds to the Chapter 13 Trustee's Motion to Dismiss case (Doc. #31).

The Debtor Responds by stating that:

1. He has provided independent evidence of his social security number to the Trustee
2. He has no other current income, other than his social security income.
3. He has made the First and Second Plan payments of \$125.00, which are represented by two (2) Money Order's mailed to the Chapter 13 Trustee's mailing address.

Respectfully submitted

Attorney for the Debtor
/s/ Glenn F. Russell, Jr.
Glenn F. Russell, Jr.
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Fall River, MA 02720
(888) 400-9318
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Ch 13-12 Trustee Boston

P. O. Box 8250

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Jason J. Giguere, Esq.

Orlans PC Attorneys for Federal Home Loan Mortgage

Corporation, as Trustee for the benefit of the Freddie

Mac Seasoned Credit Risk Transfer Trust, Series 2020-

1

PO Box 540540

Waltham, MA 02454

Marcus E. Pratt, Esquire

Korde & Associates, P.C. 900 Chelmsford Street, Suite

3102 Lowell, MA 01851 Attorneys for

The Bank of New York Mellon FKA The Bank of New

York, as successor Trustee to JPMorgan Chase Bank,

N.A., as Trustee on behalf of the Certificateholders of

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The Bank of NY Mellon Indenture Trustee
c/o Bank of America, N.A.
475 Cross Point Pkwy PO Box 9000
Getzville, NY 14068-9000

/s/ Glenn F. Russell, Jr.
Glenn F. Russell, Jr.

